

1 Q. I think you said earlier there's some 14:31:22  
2 speculation of whether Mr. McKinney was reaching for 14:31:24  
3 something or going to get something and that's why 14:31:27  
4 he moved. Do you know that for a fact? Is that 14:31:29  
5 just people kind of guessing what might have 14:31:32  
6 happened? 14:31:33

7 A. I do not know that for a fact. That's just 14:31:34  
8 us talking, trying to figure out why he went back 14:31:36  
9 in. 14:31:39

10 Q. Do you know if Curtis saw Mr. McKinney move 14:31:40  
11 at any point after giving the all clear? 14:31:41

12 A. I'm not sure. I can't say what -- what 14:31:45  
13 Curtis saw or anything. I just -- I know that he 14:31:49  
14 could have, yeah, but I don't think he -- I don't 14:31:53  
15 know what he saw to that. 14:31:55

16 Q. Is there any reason why Mr. McKinney couldn't 14:31:57  
17 have just left the straps there and waited till 14:32:01  
18 after the materials were unloaded to move the 14:32:04  
19 straps? 14:32:07

20 A. Yes. I mean, that's what he should have 14:32:08  
21 done. Yes. 14:32:09

22 Q. So you're saying he should have just waited 14:32:12  
23 till the materials were unloaded? 14:32:14

24 A. Yes. 14:32:16

25 Q. Okay. Did any of the first responders onsite 14:32:16

1 when you were there ask you or anyone at Jenkins & 14:32:46  
2 Stiles to leave any materials where they were or to 14:32:51  
3 leave the site untouched? 14:32:53  
4 A. No. 14:32:56  
5 Q. Did -- you were gone by the time TOSHA 14:32:58  
6 arrived, correct? 14:32:59  
7 A. Yes. 14:33:01  
8 Q. Are you aware of anyone from TOSHA or any of 14:33:02  
9 the first responders telling you or anyone at 14:33:04  
10 Jenkins & Stiles to leave the scene untouched? 14:33:06  
11 A. No. No. They didn't say that. 14:33:11  
12 Q. Have you ever heard of any sort of 14:33:26  
13 installation guide from Metl-Span, NCI Group, NBCI, 14:33:28  
14 or Nucor -- an installation guide about their 14:33:35  
15 insulated metal panels? 14:33:38  
16 A. No, I've not. 14:33:41  
17 Q. Have you ever seen any sort of installation 14:33:43  
18 guide? Have you ever seen any sort of metal panel 14:33:45  
19 installation guide? 14:33:47  
20 A. We have a set of shop drawings that -- that 14:33:49  
21 shows, but no, I've not seen the -- 14:33:51  
22 Q. Do the shop drawings say anything about how 14:33:54  
23 to unload materials from a truck or trailer? 14:33:56  
24 A. No, they don't. 14:33:58  
25 Q. Are you aware of anyone, whether from Jenkins 14:33:59